## REMARKS

Claims 1, 14, 16, 17, 27 and 41 have been amended. Claim 15 has been cancelled. Claims 1-14 and 16-53 are pending in the application. Reconsideration is respectfully requested in light of the following remarks.

**Section 102(e) Rejection:**

The Examiner rejected claims 1-8, 11-21, 24-35, 38-48 and 51-53 under 35 U.S.C. § 102(e) as being anticipated by Lucassen et al. (U.S. Publication 2003/0023953) (hereinafter "Lucassen"). Applicants respectfully traverse this rejection for at least the reasons below.

Regarding claim 1, Lucassen fails to disclose a dynamic component generator configured to receive a new set of requirements for an application, determine whether the new set of requirements includes changes from an initial set of requirements; and if the new set of requirements includes changes from the initial set of requirements, generate a second dynamic component to replace a first dynamic component. The Examiner cites Lucassen, paragraphs 29, 108, 109 and 123, where Lucassen describes dynamically generating interaction logic and presentation layers and customization at runtime. However, nowhere does Lucassen describe a dynamic component generator *determining whether a new set of requirements includes changes from an initial set of requirements.*

Lucassen teaches an application development system for multi-channel applications. Lucassen describes applications that allow a user to interface in parallel with same information via multiple channels and user interface, such as voice and graphics. Lucassen describes an interaction-based application framework utilizing different programming layers, such as a business logic layer, interaction logic layer, and customization layer, to specify the multi-channel applications. Lucassen's system includes an interaction manager for generating a presentation layer (Lucassen, Abstract, paragraphs 41, 59, 67, and 105 – 109). Specifically, Lucassen states, "the interaction

manager 57 receives the interaction logic layer 53 and the customization meta-data 54 and generates functional or customized presentations for a particular delivery context." Lucassen further teaches that the interaction logic layer is "an abstract description of an application that describes how a user can interact with the application" (paragraph 107) and that the customization layer includes metadata associated with the interaction logic layer to optimize the presentation that will be generated by an adaptation process for a particular delivery context (e.g. voice or graphic). Lucassen further teaches that developers use a MVC-based editor/IDE development tool including a model editor for programming the interaction logic and customization layers (paragraphs 131,134 and 137). Thus, Lucassen's application generates a presentation from a developer-generated interaction logic layer and (developer-generated) customization meta-data.

Lucassen teaches that to change the presentation views, a developer would use the development tool to "access, edit and visualize the interaction logic and customization meta-data representation" (paragraph 137). After the developer modifies the underlying interaction logic and customization meta-data, Lucassen's application would generate new, different presentations.

Lucassen's system does not include a dynamic component generator configured to determine whether a new set of requirements includes changes from an initial set of requirements. Instead, Lucassen teaches that new developer-generated interaction logic layers are used to generate new presentation layers. Thus, when a developer creates a new interaction logic layer, Lucassen's system will generate a new presentation layer accordingly. However, Lucassen's system does not include any dynamic component generator determining whether a new set of requirements includes changes from an initial set of requirements. Generating a new presentation layer based on a new interaction logic layer does not disclose or anticipate a dynamic component generator configured to determine whether a new set of requirements includes changes from an initial set of requirements, as recited in Applicants' claim.

Applicants remind the Examiner that anticipation requires the presence in a single prior art reference disclosure of each and every limitation of the claimed invention, arranged as in the claim. M.P.E.P 2131; *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 221 USPQ 481, 485 (Fed. Cir. 1984). The identical invention must be shown in as complete detail as is contained in the claims. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). As discussed above, Lucassen fails to disclose a dynamic component generator configured to determine whether a new set of requirements includes changes from an initial set of requirements. Therefore, Lucassen cannot be said to anticipate claim 1. Thus, the rejection of claim 1 is not supported by the cited art and removal thereof is respectfully requested. Similar remarks also apply to claims 14, 27 and 41.

Applicants also assert that numerous ones of the dependent claims recite further distinctions over the cited art. However, since the rejection has been shown to be unsupported for the independent claims, a further discussion of the dependent claims is not necessary at this time.

**Section 103(a) Rejection:**

The Examiner rejected claims 9, 10, 22, 23, 36, 37, 49 and 50 under 35 U.S.C. § 103(a) as being unpatentable over Lucassen in view of Umezu et al. (U.S. Publication 2002/0109734) (hereinafter "Umezu"). Applicants respectfully traverse the rejection of claims 9, 10, 22, 23, 36, 37, 49 and 50 for at least the reasons presented above regarding their respective independent claims.

## CONCLUSION

Applicants submit the application is in condition for allowance, and prompt notice to that effect is respectfully requested.

If any extension of time (under 37 C.F.R. § 1.136) is necessary to prevent the above-referenced application from becoming abandoned, Applicants hereby petition for such an extension. If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5681-08800/RCK.

Also enclosed herewith are the following items:

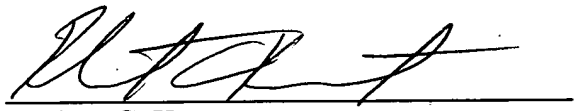
☒ Return Receipt Postcard

☐ Petition for Extension of Time

☐ Notice of Change of Address

☐ Other:

Respectfully submitted,



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Date: May 30, 2006